

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		:	ECF Case
WAYNE MILLER, for himself and on		:	
behalf of all others similarly situated,		:	No. 13 Civ. 1541 (VB)
		:	
Plaintiff,		:	
		:	DECLARATION OF STEPHEN
vs.		:	GAUSTER IN SUPPORT OF
		:	MOTION TO DISMISS
WELLS FARGO BANK, N.A., <i>et al.</i> ,		:	CLASS ACTION COMPLAINT
		:	
Defendants.		:	
<hr/>		:	

I, Stephen Gauster, declare as follows:

1. My name is Stephen Gauster. The statements set forth herein are based upon my personal knowledge, or are based upon a personal review of the corporate records and/or publicly available information, in each case prepared for me by other officers of defendants Assurant, Inc. ("Assurant") and American Security Insurance Company ("American Security"), regarding Assurant and American Security.

2. I am over 21 years of age and competent to testify to the statements set forth herein.

3. I am a Senior Vice President and Chief Corporate Counsel for Assurant. My business address is One Chase Manhattan Plaza, 41st Floor, New York, New York 10005.

4. I have reviewed the Class Action Complaint filed in this case. I make this declaration in support of Assurant's motion to dismiss.

5. I am familiar with the public company known as "Assurant, Inc.," which is a Delaware corporation whose shares trade on the New York Stock Exchange under the symbol AIZ, and whose principal place of business is New York, New York.

6. Assurant is not an insurance company, and does not issue or underwrite insurance policies.

7. Assurant does not collect premiums paid for insurance policies.

8. Assurant does not contract with residential mortgage lenders and servicers to provide any products or services.

9. Assurant does not pay, and has never paid, commissions to any residential mortgage lender or servicer.

10. Assurant is American Security's indirect parent. American Security's immediate parent is Interfinancial Inc., and Assurant is the immediate parent of Interfinancial Inc. American Security is a Delaware corporation whose principal place of business is Atlanta, Georgia. American Security is an insurance company.

11. Assurant is not involved in American Security's daily decisionmaking or business operations. Assurant maintains separate books and corporate records from American Security. American Security generates its own business.

12. Assurant does not participate in, direct, or control the placement, procurement, or binding of insurance policies that American Security issues, nor does Assurant set or participate in setting the policy terms for insurance policies issued by American Security, including the policies issued to protect plaintiff's property. None of the actuaries who work in the Miami actuarial department and perform analyses in connection with lender-placed insurance rates are employed by Assurant, Inc.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 27, 2013.


Stephen Gauster